

ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733
www.andersonkill.com

Jerry S. Goldman, Esq.
Jgoldman@andersonkill.com
212-278-1569

By Facsimile and ECF

August 26, 2015

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001
03 MDL 1570 (GBD) (FM)

Dear Judge Daniels:

In accordance with the Court's Order of August 25, 2015, enclosed is a revised proposed form of order for entry of default judgment solely as to liability against the Islamic Republic of Iran, the Iranian Ministry of Intelligence and Security, the Iranian Minister of Intelligence and Security Ali Fallahian, the Iranian Revolutionary Guard Corps, the Iranian Revolutionary Guard Corps – Qods Force, Ayatollah Ali Hoseini-Khamenei, and Deputy Commander Brigadier General of the Iranian Revolutionary Guard Corp. Mohammed Baqr Zalqadr in *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, 04-CV-1076 (GBD). Consistent with the Court's directive, the proposed form of order tracks the language and format of the Order of Judgment issued in *Havlish, et al. v. bin Laden, et al.*, 03-CV-09848 (GBD).

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas, 42nd Floor
New York, NY 10020

Attorneys for the O'Neill Plaintiffs in:
Estate of John P. O'Neill, Sr., et al. v. The
Republic of Iraq, et al., 04-CV-1076 (GBD).

Enclosures

cc: The Honorable Frank Maas (via Fax & ECF)
All Counsel of Record (via ECF)